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**MEMO ENDORSED**

June 16, 2008

Via Facsimile to 914-390-4085

Hon. Charles L. Bricant  
United States Courthouse  
300 Quarropas St., Room 275  
White Plains, NY 10601

*Application granted.  
No Order*

Re: Newmark v. Lawrence Hospital Center, et al.  
07-CV-2861 (CLB)

*Charles L. Bricant  
6/16/08 7505*

May It Please The Court:

As counsel for Lawrence Hospital Center and Catherine Magone, defendants in the above-referenced matter, I write requesting an adjournment of defendants' deadline to file a stipulation of discontinuance, or else move for summary judgment, from June 27, 2008 until July 11, 2008. The parties have been diligently pursuing settlement discussions, but need additional time to negotiate a successful compromise. There have been no prior adjournments in this matter, and all parties consent to this request.

In the event that defendants move for summary judgment on July 11, all parties respectfully further request that plaintiff be permitted to file her opposition to summary judgment no later than August 11, 2008, and that defendants' reply be filed no later than August 25, 2008. The Court has previously scheduled oral argument on the motion for September 12, 2008 at 10:00 am.

Sincerely yours,

*John Keil*

John P. Keil (JK 2794)

cc: Drita Nicaj, Esq.  
Counsel for plaintiff  
Via Facsimile: 914-428-8916